

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

JANE DOE,

Case No. 4:21-cv-3049

Plaintiff,

Hon. John M. Gerrard

v.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their official  
capacities; and OTHER UNIDENTIFIED  
DEFENDANTS;

**PLAINTIFF’S MOTION FOR LEAVE TO  
FILE RESTRICTED ACCESS  
DOCUMENTS**

Defendants.

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Plaintiff Jane Doe, pursuant to Neb. Civ. R. 5.3(C)(1), by and through undersigned counsel, respectfully moves the Court for leave to file restricted access documents in support of her Response in Opposition to Defendants’ Motion for Summary Judgment and her Response in Opposition to Defendants’ Motion to Exclude Plaintiff’s Experts (“Motions”). In support of this motion, Plaintiff states:

1. On February 7, 2022, the Court entered a Protective Order that provides: “Discovery Material designated as ‘CONFIDENTIAL’ shall be provisionally filed under restricted access with the filing party’s motion for leave to file restricted access documents.” ECF No. 32, ¶ 11.
2. In support of Plaintiff’s Briefs, Plaintiff is filing exhibits, including discovery material marked confidential, or documents that reflect information from materials marked confidentially—specifically, Exhibits 1-2 and 4-8.

3. Such confidential discovery material is necessary evidence to support Plaintiff's arguments in opposition to Defendants' Motions.
4. Because the documents themselves are protected as confidential or reflect confidential information, redaction would insufficiently protect the documents as required by the Court's Protective Order.
5. The confidential documents have been provisionally filed under restricted access.

WHEREFORE, Plaintiff respectfully requests leave of the Court to file restricted access documents (Exhibits 1-2 and 4-8) in opposition to Defendants' Motions.

DATED: November 13, 2023

Respectfully submitted,

/s/ Karen Truszkowski

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2023, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic system.

/s/ Elizabeth K. Abdnour

Elizabeth K. Abdnour